

JAN 17 2019

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
DANVILLE DIVISION

JULIA C. DUDLEY, CLERK  
BY: s/ H. McDONALD  
DEPUTY CLERK

UNITED STATES OF AMERICA )

V. )

CHRISTOPHER TODD DAVIS )

Case No. 4:19CR2

INDICTMENT

In violation of:

) 18 U.S.C. § 922(g)(1)

) 21 U.S.C. §§ 841(a)(1), (b)(1)(C)

) 18 U.S.C. § 924(c)

COUNT ONE

The Grand Jury charges that:

1. On or about July 13, 2018, in the Western Judicial District of Virginia, the defendant, CHRISTOPHER TODD DAVIS, having been previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess a firearm, to wit a Glock, model 19, 9mm pistol, which previously had been shipped and transported in interstate or foreign commerce.

2. All in violation of Title 18, United States Code, § 922(g)(1).

COUNT TWO

The Grand Jury further charges that:

1. On or about July 13, 2018, in the Western Judicial District of Virginia, the

defendant, CHRISTOPHER TODD DAVIS, knowingly and intentionally possessed with intent to distribute a measurable quantity of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance.

2. All in violation of Title 21, United States Code, §§ 841(a)(1) and (b)(1)(C).

### **COUNT THREE**

The Grand Jury further charges that:

1. On or about July 13, 2018, in the Western Judicial District of Virginia, the defendant, CHRISTOPHER TODD DAVIS, knowingly and intentionally possessed with intent to distribute a measurable quantity of a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance.

2. All in violation of Title 21, United States Code, §§ 841(a)(1) and (b)(1)(C).

### **COUNT FOUR**

The Grand Jury further charges that:

1. On or about July 13, 2018, in the Western Judicial District of Virginia, the defendant, CHRISTOPHER TODD DAVIS, did knowingly possess a firearm, to wit a Glock, model 19, 9mm pistol, in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, as set forth in Counts Two and Three of this Indictment.

2. All in violation of Title 18, United States Code, Section 924(c).

## NOTICE OF FORFEITURE

1. Upon conviction of one or more of the felony offenses alleged in this Indictment, the defendant shall forfeit to the United States:
  - a. any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses, pursuant to 21 U.S.C. § 853(a)(1).
  - b. any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said offenses, pursuant to 21 U.S.C. § 853(a)(2).
  - c. any firearms used or intended to be used to facilitate the transportation, sale, receipt, possession, or concealment of controlled substances and/or raw materials, as described in 21 U.S.C. § 881(a)(1) and (2), and any proceeds traceable to such property, pursuant to 21 U.S.C. § 881(a)(11) and 28 U.S.C. § 2461(c).
  - d. any firearms and ammunition involved or used in the commission of said offenses, or possessed in violation thereof, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c).
2. The property to be forfeited to the United States includes but is not limited to the following property:
  - a. **Currency**
    1. \$834.00 in U.S. Currency.
  - b. **Firearm(s) and Ammunition or other assets**
    1. Glock, model 19, 9mm, pistol, serial number KSD565
    2. Glock magazines and 9mm ammunition;
    3. 50 rounds 40 cal. ammunition.


3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

A **TRUE BILL**, this 17<sup>th</sup> day of January, 2019.

/S/FOREPERSON  
FOREPERSON

*For*   
\_\_\_\_\_  
Thomas T. Cullen  
United States Attorney